

DAVID H. ANGELI, OSB No. 020244
david@angelilaw.com
PETER D. HAWKES, OSB No. 071986
peter@angelilaw.com
KRISTEN TRANETZKI, OSB No. 115730
kristen@angelilaw.com
ANGELI LAW GROUP LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880

ENU A. MAINIGI, admitted *pro hac vice*
emainigi@wc.com
JONATHAN B. PITTS, admitted *pro hac vice*
jpitt@wc.com
A. JOSHUA PODOLL, admitted *pro hac vice*
apodoll@wc.com
WILLIAMS & CONNOLLY LLP
680 Maine Avenue SW
Washington, DC 20024
Telephone: (202) 434-5000

EDWARD HASSI, admitted *pro hac vice*
thassi@debevoise.com
DEBEVOISE & PLIMPTON LLP
801 Pennsylvania Avenue N.W.
Washington, DC 20004
Telephone: (202) 383-8000

MICHAEL SCHAPER, admitted *pro hac vice*
mschaper@debevoise.com
SHANNON ROSE SELDEN, admitted *pro hac vice*
srseldden@debevoise.com
J. ROBERT ABRAHAM, admitted *pro hac vice*
jrabraham@debevoise.com
NATASCHA BORN, admitted *pro hac vice*
nborn@debevoise.com
DEBEVOISE & PLIMPTON LLP
66 Hudson Boulevard
New York, NY 10001
Telephone: (212) 909-6000

JAMES A. FISHKIN, admitted *pro hac vice*
james.fishkin@dechert.com

MICHAEL COWIE, admitted *pro hac vice*
mike.cowie@dechert.com

DECHERT LLP
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 261-3300

Attorneys for Albertsons Companies, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

Case No. 3:24-cv-00347-AN

FEDERAL TRADE COMISSION, et al.

Plaintiffs,

v.

THE KROGER COMPANY and
ALBERTSONS COMPANIES, INC.

Defendants.

**DEFENDANT'S UNOPPOSED
MOTION FOR ENTRY OF A
STIPULATED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)

MOTION

Pursuant to Fed. R. Civ. P. 26(c), Defendant Albertsons Companies, Inc. moves for entry of a Stipulated Protective Order in the form submitted herewith. Defendant The Kroger Company and Plaintiffs have signed the proposed Stipulated Protective Order and do not oppose this motion.

MEMORANDUM

One or more of the parties has requested the production of documents or information that at least one party considers to be or to contain confidential information, and that are subject to protection under Federal Rule of Civil Procedure 26(c).

The parties agree that good cause exists to protect the confidential nature of the information contained in documents, interrogatory responses, responses to requests for admission, or deposition testimony. The parties expect to exchange documents and information relating to confidential information, or sensitive or personal commercial information. The parties agree that the entry of the proposed Stipulated Protective Order is warranted to protect against disclosure of such documents and information.

DATED this 26th day of April, 2024.

Respectfully submitted,

ANGELI LAW GROUP LLC

/s Peter D. Hawkes
ANGELI LAW GROUP LLC
PETER D. HAWKES, OSB No. 071986
KRISTEN TRANETZKI, OSB No. 115730
DAVID H. ANGELI, OSB No. 020244

WILLIAMS & CONNOLLY LLP
ENU A. MAINIGI, admitted *pro hac vice*
JONATHAN B. PITTS, admitted *pro hac vice*
A. JOSHUA PODOLL, admitted *pro hac vice*

DEBEVOISE & PLIMPTON LLP
EDWARD HASSI, admitted *pro hac vice*
MICHAEL SCHAPER, admitted *pro hac vice*
SHANNON ROSE SELDEN, admitted *pro hac vice*
J. ROBERT ABRAHAM, admitted *pro hac vice*
NATASCHA BORN, admitted *pro hac vice*

DECHERT LLP
JAMES A. FISHKIN, admitted *pro hac vice*
MICHAEL COWIE, admitted *pro hac vice*

Attorneys for Albertsons Companies, Inc.